

From: Don Raymond [bogworks@texas.net@inter2]
Sent: Wednesday, May 31, 2000 8:27 PM
To: DocketClerk, MOAB
Subject: Docket No. FV00-9292 PR, May 30,2000 Federal Register, Pg. 34411-34420



Gentlemen:

I am a cranberry grower from Massachusetts with eighteen acres of cranberry bogs. As stated in my letter to Secretary Glickman on May 5, 2000, I support the fifteen percent producer allotment recommended by the Cranberry Marketing Committee which is based on the average of the highest four out of the last six years of sales.

A volume reduction is collectively the best approach for the industry in order to reduce the severe over-supply situation and to stabilize prices. However, we should not delude ourselves that the demand side of the problem will be corrected in one year. Until a significant increase in demand is realized to support existing acreage and also the more efficient, higher yielding acreage coming into production in the U.S. and Canada, I believe that a marketing order will have to remain in effect for an additional year or more.

Whether the small family farms that have built and sustained the cranberry industry in the twentieth century will survive during this period of uncertainty is questionable. It is a definite certainty that a significant number of cranberry growers will be forced out of business, if there is not a marketing order implemented and an attendant increase in demand. To minimize production costs, it is critical that USDA act quickly in order for growers to adjust practices to deliver a reduced volume of cranberries.

While the overall impact on crop reduction is supposedly the same under USDA Option 1 and the 15% CMC Option, growers who recognized the eventuality of a surplus problem and chose to heed handlers' call for increased production will be unduly disadvantaged under USDA Option 1. Unless these growers have experienced a significant spike in production over their average production level, their set aside will be far in excess of the 15% CMC Option. To change the basis on which a grower's sales average is calculated to one which is based on the best year out of the last six would result in rewarding the very growers who have created the over-supply situation we are now in. The only true winners in this debacle are the handlers whose actions have resulted in the current situation, in order to reduce their cost of raw materials, i.e. cheap cranberries.

Sincerely,

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